

United States Bankruptcy Court
Eastern District of Texas
Sherman Division

In re:

Empire Countertops, LLC

1137 Enterprise Dr.

Pilot Point, TX 76258

EIN: 45-1145076

Debtor

Empire Countertops, LLC,

Plaintiff

v.

**JPMorgan Chase & Co., Eagle Eye
Advance LLC, Block Inc. fka Square Inc.,
and Last Chance Funding, Inc.**
Defendants

Case No. 22-41686-btr

Chapter 11

Adversary No. 22-04066

**Hearing Set For:
December 15, 2022 @ 9:45 a.m.**

EXHIBIT LIST OF EMPIRE COUNTERTOPS, LLC

Exhibit	Description of Exhibit	Offered	Objection	Admitted
1.	Empire's Petition for Chapter 11 Relief – 12/05/22			
2.	Demand on Chase to Turnover of Funds – 12/07/22			
3.	Demand on Block to Turnover of Funds – 12/08/22			
4.	Sample Statement from Chase Bank			
5.	Legal Holds Placed on Chase Bank Accounts			
6.	Notice of Hold on Block Inc. Account			
7.	UCC Liens Filings on Accounts			
8.	Wells Fargo DIP Account for Empire			
9.	Any item filed of record in this proceeding			

10.	Any exhibit introduced by any other party			
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WITNESS LIST

1. Curtis “Mitch” Mahoney, Debtor’s Representative
2. Scott Laine, Debtor’s Controller
3. Any witness called or listed on opposing counsel’s list.

The Debtor reserves the right to use any exhibit introduced into evidence by any other party, to introduce and use any document that has been filed in this bankruptcy proceeding, to use any witness or exhibit not listed herein for purposes of rebuttal or impeachment, and to supplement or amend this witness and exhibit list at any time prior to the hearing.

DATED: December 14, 2022.

Respectfully submitted:

NORRED LAW, PLLC

By: /s/ Clayton L. Everett

Clayton L. Everett

Texas State Bar No. 24065212

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Arlington, Texas 76010

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Proposed Counsel for Debtor & Plaintiff

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the Plaintiff’s Witness Exhibit List was served on upon the parties receiving notice via the Court’s CM/ECF system and as listed below:

The LCF Group, Inc.
3000 Marcus Ave. Suite 2W15
New Hyde Park, NY 11042

Eagle Eye Advance LLC
254 36th Street, Ste. C303
Brooklyn, NY 11232

Block Inc. fka Square Inc.
c/o C T Corporation
1999 Bryan St., Ste. 900
Dallas, TX 75201-3136

Jeremy S. Williams
901 East Byrd Street, Suite 1000
Richmond, Virginia 23219
Via: jeremy.williams@kutakrock.com
Counsel for Eagle Eye Advance LLC

JPMorgan Chase & Co.
c/o C T Corporation
1999 Bryan St., Ste. 900
Dallas, TX 75201-3136
And Via Fax: 225-341-3302

By: ___/s/ Clayton L. Everett_____